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October 21, 2024

**Via ECF**

The Honorable Naomi R. Buchwald  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *Cequel Communications, LLC d/b/a Suddenlink Communications v. MOX Networks, LLC, No. 21-cv-5577*

Dear Judge Buchwald:

Counsel for Plaintiff, Cequel Communications, LLC d/b/a Suddenlink Communications, and for Defendant, MOX Networks, LLC (together, the “Parties”) jointly write to respectfully request an extension of the deadline to file a proposed schedule for the resolution of the outstanding claims in this matter. On August 23, 2024, the Court issued a Memorandum and Order (the “August 23 Order”) granting Plaintiff’s motion for summary judgment on its first three claims for breach of contract and denying Defendant’s cross-motion for partial summary judgment. *See* ECF No. 88. The Court directed the Parties, if unable to resolve the remaining claims, to file a proposed schedule for their resolution within 45 days of the August 23 Order. *Id.* On October 4, 2024, the Parties jointly requested an extension of this deadline to October 21, 2024, which the Court granted. *See* ECF No. 89 & 90.

Since the Parties’ October 4, 2024 request, the Parties have continued to engage in good faith negotiations in efforts to resolve the remaining claims. The negotiations are ongoing, and the Parties believe that a further extension would be productive. Accordingly, the Parties respectfully request to extend the deadline to file a proposed schedule for resolving the remaining claims by five weeks, to November 25, 2024. This is the Parties’ second request for an extension of this deadline and this request does not affect any other scheduled dates.

Thank you for Your Honor's attention to this matter.

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By: /s/ Avni P. Patel

Avni P. Patel  
*Attorneys for Plaintiff*

FAEGRE DRINKER BIDDLE &  
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By: /s/ Marsha J. Indych

Marsha J. Indych  
*Attorneys for Defendant*

Application granted.

**SO ORDERED.**



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: October 23, 2024  
New York, New York